

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	
	)	Chapter 11
	)	
JOANN INC., <sup>1</sup>	)	Case No. 25-10068 (CTG)
	)	
Post-Effective Date Debtor.	)	
	)	Hearing Date: January 28, 2026 at 10:00 a.m. (ET)
	)	Response Deadline: January 16, 2026 at 4:00 p.m. (ET)

**NOTICE OF PLAN ADMINISTRATOR'S TWENTY-SECOND (SUBSTANTIVE)  
OMNIBUS OBJECTION TO CERTAIN NO LIABILITY CLAIMS**

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***TO ALL PARTIES RECEIVING THIS OBJECTION:***

**YOU SHOULD REVIEW SCHEDULE 1 TO THE PROPOSED ORDER ATTACHED AS EXHIBIT A TO THE OBJECTION TO LOCATE YOUR NAME AND CLAIM(S) AND DETERMINE IF YOUR CLAIM(S) ARE SUBJECT TO THIS OBJECTION. IF YOUR CLAIM(S) ARE LISTED ON THE EXHIBIT ATTACHED TO THE PROPOSED ORDER, YOU MAY HAVE SUBSTANTIVE RIGHTS AFFECTED BY THIS OBJECTION.**

**YOUR SUBSTANTIVE RIGHTS MAY ALSO BE AFFECTED BY FURTHER OBJECTIONS THAT MAY BE FILED IN THESE CHAPTER 11 CASES.**

**THE RELIEF SOUGHT IN THIS OBJECTION IS WITHOUT PREJUDICE TO THE RIGHTS OF THE PLAN ADMINISTRATOR, THE DEBTORS/WIND-DOWN DEBTORS, THEIR ESTATES, ANY SUCCESSORS THERETO OR ANY OTHER PARTY IN INTEREST TO PURSUE FURTHER OBJECTIONS AGAINST THE CLAIMS SUBJECT TO THIS OBJECTION, AND NOTHING HEREIN OR IN THE PROPOSED ORDER IS INTENDED OR SHALL BE DEEMED TO BE AN ALLOWANCE OF ANY SUCH CLAIMS.**

**PLEASE TAKE NOTICE** that, on December 26, 2025, the Plan Administrator appointed in the above-captioned cases filed the attached *Plan Administrator's Twenty-Second (Substantive) Omnibus Objection to Certain No Liability Claims* (the "Objection").<sup>2</sup>

**PLEASE TAKE FURTHER NOTICE** that any responses (each, a "Response") to the relief requested in the Objection must be filed on or before **4:00 p.m. (prevailing Eastern Time)**

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<sup>1</sup> The Post-Effective Date Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number, is: JOANN Inc. (5540). The Post-Effective Date Debtor's mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to the terms in the Objection.

on **January 16, 2026 (the “Response Deadline”)** with the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “Court”). At the same time, any party submitting a Response (each, a “Respondent”) must serve a copy of its Response upon the undersigned counsel to the Plan Administrator so as to be received on or before the Response Deadline.

**PLEASE TAKE FURTHER NOTICE** that any Response must contain, at a minimum, the following:

- a) a caption setting forth the name of the Court, the above-referenced case number, and the title of the Objection to which the Response is directed;
- b) the name of the claimant and description of the basis for the allowance of the Non-GUC Claim;
- c) a concise statement setting forth the reasons why a particular Non-GUC Claim should not be disallowed and expunged in its entirety for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which the claimant will rely in opposing the Objection at the Hearing.

**PLEASE TAKE FURTHER NOTICE** that the hearing to consider the Objection will be held on **January 28, 2026 at 10:00 a.m. (prevailing Eastern Time) (the “Hearing”)** before The Honorable Craig T. Goldblatt, United States Bankruptcy Court Judge for the District of Delaware, 824 N. Market Street, 3rd Floor, Courtroom No. 7, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE OBJECTION WITHOUT FURTHER NOTICE OR A HEARING.**

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Dated: December 26, 2025  
Wilmington, Delaware

*/s/ Michael E. Fitzpatrick*

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**COLE SCHOTZ P.C.**

Patrick J. Reilley (No. 4451)

Stacy L. Newman (No. 5044)

Jack M. Dougherty (No. 6784)

Michael E. Fitzpatrick (No. 6797)

500 Delaware Avenue, Suite 600

Wilmington, Delaware 19801

Telephone: (302) 652-3131

Facsimile: (302) 652-3117

Email: preilley@coleschotz.com  
snewman@coleschotz.com  
jdougherty@coleschotz.com  
mfitzpatrick@coleschotz.com

- and -

**HAHN LOESER & PARKS LLP**

Christopher B. Wick (admitted *pro hac vice*)

Philip K. Stovall (admitted *pro hac vice*)

200 Public Square, Suite 2800

Cleveland, Ohio 44114

Telephone: (216) 274-2489

Facsimile: (216) 241-2824

Email: cwick@hahnlaw.com  
pstovall@hahnlaw.com

*Co-Counsel to the Plan Administrator*